



Charanjit Brahma  
Tel 202.331.3100  
Fax 202.331.3101  
brahmac@gtlaw.com

February 28, 2013

**HAND DELIVERY & ECF**

The Honorable Yvonne Gonzalez Rogers, U.S.D.J.  
United States District Court  
Northern District of California  
Oakland Courthouse  
Courtroom 5 – 2<sup>nd</sup> Floor  
1301 Clay St.  
Oakland, CA 94612

Re: *Jongerius Panoramic Technologies, LLC v. Google Inc. and Apple Inc.*  
Civil Action No. C 12-03797-YGR

Dear Judge Gonzalez Rogers:

This firm, along with Ropes & Gray LLP, submits this joint letter on behalf of Defendants, Google Inc. and Apple Inc., in the above-referenced action. We write requesting clarification of this Court's Standing Order for Patent Cases (Revised August 6, 2012). Specifically, Defendants seek to clarify whether it is permissible for the parties to first raise issues of indefiniteness during the invalidity phase of the case, rather than the claim construction phase. Defendants believe that doing so would be preferable to avoid bogging down the claim construction proceedings, but wanted to ensure that the Court does not prefer to address indefiniteness challenges during claim construction.

Respectfully,

A handwritten signature in blue ink that reads "Charanjit Brahma".

Charanjit Brahma

cc: All Counsel of Record (via ECF)

ALBANY  
AMSTERDAM  
ATLANTA  
AUSTIN  
BOSTON  
CHICAGO  
DALLAS  
DELAWARE  
DENVER  
FORT LAUDERDALE  
HOUSTON  
LAS VEGAS  
LONDON\*  
LOS ANGELES  
MEXICO CITY\*  
MIAMI  
MILAN\*\*  
NEW JERSEY  
NEW YORK  
ORANGE COUNTY  
ORLANDO  
PALM BEACH COUNTY  
PHILADELPHIA  
PHOENIX  
ROME\*\*  
SACRAMENTO  
SAN FRANCISCO  
SHANGHAI  
SILICON VALLEY  
TALLAHASSEE  
TAMPA  
TEL AVIV\*  
TYSONS CORNER  
WARSAW~  
WASHINGTON, D.C.  
WHITE PLAINS

\* OPERATES AS GREENBERG  
TRAURIG MAHER LLP

\* OPERATES AS  
GREENBERG TRAURIG, S.C.

\* A BRANCH OF  
GREENBERG TRAURIG, P.A.  
FLORIDA, USA

\* OPERATES AS  
GREENBERG TRAURIG GRZESIAK LLP

\*\* STRATEGIC ALLIANCE